

**Clean Water Action Alliance, Gulf Restoration Network, Institute for  
Agriculture and Trade Policy, Iowa Environmental Council, Izaak Walton  
League, The Minnesota Project, Mississippi River Basin Alliance, National  
Center for Appropriate Technology, National Resources Defense Council**

May 30, 2000

Mr. Chuck Fox  
Chair, Mississippi River/Gulf of Mexico Watershed Nutrient Task Force  
Office of Water  
US Environmental Protection Agency  
401 M Street, SW (4101)  
Washington, DC 20460

Dear Mr. Fox:

We, the undersigned, are writing to express our concerns regarding the delay in producing an Action Plan that comprehensively addresses the root causes of nitrogen pollution in the Mississippi River Basin. As you are well aware, the Harmful Algal Bloom and Hypoxia Research and Control Act of 1998 requires that the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force (Task Force) present to Congress a plan for reducing, mitigating, and controlling hypoxia in the northern Gulf of Mexico by March 30, 2000. More than 45 days after that deadline the Task Force has yet to produce even a draft Action Plan that incorporates the findings of the recently completed Integrated Assessment. It is imperative that the Task Force proceed with all deliberate speed to finalize an Action Plan to address the root causes of hypoxia in the Gulf.

We are aware that many interests are calling for delay in the production of an Action Plan due to purported scientific uncertainties. The Integrated Assessment aptly points out that there are always uncertainties in scientific analysis. These uncertainties should not be used as an excuse for delay in the development and implementation of an action oriented agenda to address the clearly identified causes of hypoxia. Environmental responses to reductions in nitrogen will be slow, possibly requiring decades. Continuing delay in production and implementation of an Action Plan will only serve to increase the risk to the valuable resources of the Gulf associated with persistent hypoxia.

Any Action Plan produced by the Task Force must effectively and systematically address the problem of nitrogen polluted waters in the Mississippi River Basin. We would ask that special attention be paid to the findings of the Committee on Natural Resources' (CENR) scientific assessment of the causes and consequences of Gulf hypoxia. Report 5, by Mitsch, et. al., found

that a 20 to 30 percent reduction in nitrogen loading in the Mississippi river could be achieved through a combination of actions, including improved management of fertilizer and manure, restoration of five million acres of wetlands and 19 million acres of riparian areas, careful design and operation of diversions in the lower Mississippi River; and reduction of point sources, including strict requirements for tertiary treatment for all new Public Owned Treatment Works (POTWs). Similarly, in Report 6 Doering et. al concluded that a strategy that combined restoration of five million acres with a 20 percent reduction in fertilizer use would be the most cost-effective strategy.

We would also ask that the Task Force carefully consider the following concerns, more specifically set forth in the attached comments on the Draft Integrated Assessment filed by the Mississippi Riverwise Partnership

- 1) the potential offsetting effect of increases in the use of subsurface tile drainage on decreases in fertilizer use;
- 2) the need for improved management of feedlot runoff, particularly that of large, concentrated feeding operations;
- 3) the use of cover crops as a strategy for sequestering soluble nutrients;
- 4) the impact of whole farm systems on nitrogen pollution; and
- 5) the need for comprehensive monitoring of best management (BMPs) practices to ensure that BMPs are effective in reducing nitrogen loadings.

Moreover, we urge that within the Action Plan the Task Force set mid- and long-term goals for the reduction of nitrogen loading in the Mississippi River Basin, and identify specific actions that can be implemented immediately. EPA has yet to do so.

It is imperative that the Task Force finalize and begin implementation of the Action Plan. Continuing delay violates the provisions of the Harmful Algal Bloom and Hypoxia Research and Control Act of 1998 and jeopardizes the continuing health of the valuable resources of the Gulf of Mexico.

Respectfully submitted:

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